

this issue.” Avent asked Mills to “do what you think we need to do to take care of the President’s best interests on this.” Mills has no recollection of providing any information or guidance to Ickes or his staff about the Hudson matter, and does not recall receiving any information about White House communications with Interior on this application.²⁹⁶ Likewise, neither Ickes nor his staff has any recollection or record of receiving any information or guidance from Mills about the Hudson matter.

Notwithstanding Avent’s notice to both Ickes and O’Connor that the White House should not and could not intervene in the Hudson matter, Ickes tried to reach O’Connor about Hudson in the days following O’Connor’s April 24 conversations with the President and Lindsey. Ickes called O’Connor on April 25 and 26, and O’Connor called back at least twice on the 26. They apparently missed one another on each occasion. O’Connor called Ickes again on April 27, but again to no avail. O’Connor said that he then decided to rely upon the intercessions of Fowler to reach Ickes.²⁹⁷

²⁹⁶Sept. 3, 1999, Mills Responses to Questions Posed by Office of Independent Counsel at 1. This Office sought interviews or testimony of numerous White House witnesses. The only such witness who did not fully and promptly comply with the request was Mills, who agreed at the end of the investigation to submit sworn written responses to written questions in lieu of an interview. She submitted these written responses (totaling 11 sentences of text) more than 12 weeks after the seven narrow questions were submitted, and more than five months after this Office first identified her to the White House as a witness in this investigation.

²⁹⁷Corcoran’s time billing records reflect that he had several discussions with Heather Sibbison and a discussion with George Skibine the day after O’Connor’s encounter with the President. Again on April 27, his records reflect discussions with Sibbison. Corcoran recalls that during this time period he informed Sibbison that O’Connor had briefly talked with the President about the Hudson matter and that the President had handed the issue off to Bruce Lindsey. Although he also remembers informing Sibbison that O’Connor was getting some response for the first time from the White House at the staff level, Corcoran cannot recall whether or not he mentioned Harold Ickes. He acknowledges, however, that he was aware that
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